

Di-az et al v. Tesla, Inc. et al
U.S. District Court for the Northern District of California
Case No. 17-cv-06748-WHO

EXHIBIT 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,
vs.
No. 3:17-cv-06748-WHO

TESLA, INC. Dba TESLA MOTORS,
INC.; CITISTAFF SOLUTIONS,
INC.; WEST VALLEY STAFFING
GROUP; CHARTWELL STAFFING
SERVICES, INC.; NEXTSOURCE,
INC.; and DOES 1-50,
inclusive,

Defendants.

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DEPOSITION OF LUDIVINA LEDESMA

June 6, 2019

Reported by:

Bridget M. Mattos, CSR No. 11410

LUDIVINA LEDESMA

June 6, 2019

1 relating to racial harassment and discrimination.

2 MR. LAFAYETTE: We object to that.

3 MR. ORGAN: Q. And topic 46, your current
4 financial condition, including, though not limited to,
5 shareholder equity and information contained in your
6 most recent audited financial statements.

7 MR. LAFAYETTE: We object to that.

8 MR. ORGAN: Okay.

9 Q. And are there any additional documents that
10 you have to produce today that haven't been produced?

11 MR. LAFAYETTE: I don't think there are any
12 that have not been produced. I think we have
13 documents here that basically mirror what we've
14 produced before.

15 MR. ORGAN: Okay.

16 Q. So let's start with topic 1, Defendant's
17 policies and procedures related to race harassment in
18 effect from 2014 to the present.

19 Would you at least know from 2015 to the
20 present, or October of 2015 to the present, when you
21 started; right?

22 **A. Correct.**

23 Q. What is the form of those policies or what's
24 the name of the document that would include
25 CitiStaff's policies and procedures relating to race

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1 harassment?

2 **A. Handbook.**

3 Q. Handbook. Okay.

4 MR. LAFAYETTE: When you get a chance, can we
5 take a break?

6 MR. ORGAN: Yeah, sure. You want to take a
7 break now?

8 MR. LAFAYETTE: Yes.

9 MR. ORGAN: The time is 11:17. We're off the
10 record.

11 (Recess taken from 11:17 a.m. to 11:24 a.m.)

12 MR. ORGAN: We're back on the record. The
13 time is 11:24. We were talking about the West Valley
14 handbook.

15 MR. LAFAYETTE: Not West Valley.

16 MR. ORGAN: Not West Valley. Yeah,
17 CitiStaff.

18 MR. LAFAYETTE: It's all right.

19 MR. ORGAN: I was just looking --

20 MR. LAFAYETTE: We all know.

21 MR. ORGAN: -- at a West Valley document.

22 Sorry about that.

23 Here we go: CitiStaff handbook. So this has
24 been previously marked as Exhibit 82.

25 MR. LAFAYETTE: Exhibit 82?

LUDIVINA LEDESMA

June 6, 2019

1 State of California)

2 County of Marin)

3

4 I, Bridget M. Mattos, hereby certify
5 that the witness in the foregoing deposition was by me
6 duly sworn to testify to the truth, the whole truth
7 and nothing but the truth in the within entitled
8 cause; that said deposition was taken at the time and
9 place herein named; that the deposition is a true
10 record of the witness's testimony as reported to the
11 best of my ability by me, a duly certified shorthand
12 reporter and disinterested person, and was thereafter
13 transcribed under my direction into typewriting by
14 computer; that the witness was given an opportunity to
15 read, correct and sign the deposition.

16 I further certify that I am not
17 interested in the outcome of said action nor connected
18 with or related to any of the parties in said action
19 nor to their respective counsel.

20 IN WITNESS WHEREOF, I have hereunder
21 subscribed my hand on June 6, 2019.

22

23 BRIDGET M. MATTOS, CSR NO. 11410

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